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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: §
§ **CASE NO. 14-51038**
Graciela M. Salinas a/k/a Graciela Marie § **CHAPTER 13**
Salinas §
Debtor, §
RESPONSE TO DEBTOR'S MOTION TO DEEM THE DEBTOR CURRENT WIT HER
MORTGAGE PAYMENTS OWED TO BSI FINANCIAL SERVICES
(Objection to Proof of Claim Doc# 47)

COMES NOW, U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF THE IGLOO SERIES III TRUST ("Creditor") and files its response to Debtor's Motion to Deem Debtor Current ("Debtor's Motion to Determine") and in support thereof states as follows:

1. Creditor admits to the allegations in Paragraphs 1 and 2 of Debtor's Motion to Determine.

2. As Paragraph 3 of Debtor's Motion to Determine, the allegations contained therein constitute legal argument which does not require a response, however, to the extent response is necessary, Creditor denies same. In addition, Creditor affirmatively asserts that Creditor has been in contract with Debtor by and through her attorney and it appears that Debtor has made additional payments since the filing of Creditor's response, and it appears that Debtor is currently due for her payment for

August 2018 and September 2018 and is in contact with Debtor's attorney as to proof of payment.

3. The allegations in Paragraph 4 of the Debtor's Motion to Determine constitute legal argument which do not require a response; however, to the extent an response is necessary, Creditor denies same.

WHEREFORE, Creditor prays that Debtor's Motion to Determine be denied consistent with the response set forth above and for such other relief the court deems just and proper.

Respectfully submitted,

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ATTORNEYS FOR MOVANT

By: /s/ Richard Anderson

RICHARD E. ANDERSON

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motion to Determine was served on the 4th day of September 2018. Said Response was filed electronically. Service was accomplished by the method and to the following as indicated.

By: /s/ Richard Anderson
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